

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
AHSTW Comm School District (04410000)
SNP - Review ID: 4682

Program Year: 2018
Month of Review: December
Lead Reviewer: Brenda Windmuller
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two Application errors were identified. Both were determined as free and should have been reduced. Fiscal Action will be assessed.	Notification was sent to households during on-site visit. State your plan to avoid these errors in the future.	
1000 - Local School Wellness Policy	V-1000	ASSESSMENT (1000): Assessment of Wellness Policy was not completed. Completed assessment is required to be made public.	Submit a timeline and plan on when the district will be assessed on the implementation of the Local School Wellness Policy. Include a plan on how this information will be made available to the public.	
1200 - Professional Standards	V-1200	<p>ANNUAL TRAINING: Annual Professional Development has not been completed as required by staff working with the School Lunch Program. All Food Service staff and SFA employees working with the School Lunch Program are required to take 1 hour of Civil Rights annually. Documentation on file did not support completion of required Professional Development for academic years 2016-2017 or 2017-2018. Training hours should meet the following guidelines:</p> <p>Director- 12 hours annually</p> <p>Manager- 10 hours annually</p> <p>Full-Time Staff- 6 hours annually</p>	Submit a plan to assure that all positions who provide functions to the safe and compliant operation of the USDA School Nutrition Program will be trained to carry out those duties. Include a comprehensive list of all employees involved in the School Lunch Program, what trainings they plan to take, the date they plan to take the class and the number of CEH for the class.	

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		Part-time Staff- 4 hours annually	
Resource Mgt Comprehensive Review	V-RMCRF	PLE: Paid Lunch Equity tool requirements were not followed.	SFA will submit a plan to raise the Lunch prices to a level compliant with the PLE Tool. SFA will include documentation of board approval or date of next board meeting and agenda documenting lunch prices will be addressed.

Site - Level Findings: AHST Elementary School (0409)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Menus, production records, and invoices do not support adequate quantities of vegetable sub-group-dark green vegetables were prepared or served during the review month. Fiscal Action will be assessed.	SFA will 1. Submit February's menu, documenting that all required components have been planned each day/week to include all required vegetable subgroups. 2. Submit January and February invoices for Martin Brothers, Reinhart and USDA Foods (if applicable) 3. Submit production records for January 22- February 23 for both the elementary and high school.	
1400 - Food Safety	V-1400	Food Safety Plan: A written Food Safety Plan is required to be at any facility where food is stored, prepared, or served for NSLP, SBP or other FNS programs. The food safety plan should apply the HACCP principles and its' required elements which include: Documenting menu items in the appropriate HACCP process category, Documenting Critical Control Points of food production, Monitoring food safety, Establishing and documenting corrective actions, Recordkeeping, Reviewing and supervising the overall food safety program periodically. SFAs must Develop, Document, and Implement SOPs, standard operating procedures, which are the foundation of a School Food Safety Program. SOPs are step-by-step written instructions for routine food service tasks. Each SOP should include instructions on monitoring, documentation, corrective action. Should also have a SOP on feeding in the classroom if applicable. Topics should include, but not be limited to handling body fluids, lock-out-tag out,	The SFA will 1. Submit a plan to train kitchen staff on the content of the HACCP manual and 2. Make a copy of the HACCP manual for the Elementary School Kitchen 3. State that the Elementary has a copy of the HACCP manual and Inform the SA where the HACCP manual will be kept in the Elementary School Kitchen.	

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		chemical testing, hair restraints, proper temperatures, hand washing, glove usage, safe knife handling, slips, trips and falls. All staff should be aware of the contents of the HACCP manual and have access to it.		
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Org - Level Technical Assistance

Area	Question	Comments
700 - Resource Management		<p>USDA FOODS: SFA is currently not utilizing USDA Foods (commodities) to the fullest of their ability; spending only 51% of their funds in 2016/2017. This program is in place to help off-set some of the expenses associated with the School Lunch Program. The SA is hosting a webinar on Monday January 22nd. It is advised that the FSD attends this webinar.</p>
700 - Resource Management		<p>PROCUREMENT: Technical Assistance was given to correct minor errors in the completed Procurement Plan. Basic principles were also reviewed.</p> <p>Procurement Plan and Code of Conduct must be completed annually.</p> <p>Must have signed debarment certifications kept on file.</p> <p>Include Buy American Clause in all Small and Formal Purchase agreements.</p> <p>Three types of purchases, (Federal Thresholds):</p> <p>Micro-purchase- under or equal to \$3500 (or local purchasing threshold if more restrictive) can be made without a quotation.</p> <p>Track micro purchases, what purchased when and dollar amount.</p> <p>Purchases should be distributed around community, not just one store.</p>

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		<p>Small Purchases- Purchases that are under \$150,000 (or local purchasing threshold if more restrictive), can be made by requesting a quotation (3 bids and a buy) which is an informal method.</p> <p>Include all terms and conditions</p> <p>Include terms: Buy American and Equal Opportunity</p> <p>Attain Signed Debarment Statements</p> <p>Awarded on lowest price (unless written documentation to justify)</p> <p>Maintain documentation</p> <p>Formal Purchase- Purchases equal to and exceeding \$150,000 (or local purchasing threshold if more restrictive), a request for proposal (RFP) or Competitive Sealed bid/Invitation for bid (IFB) process must be used.</p> <p>Notice of accepting all types of formal purchase must be advertised.</p> <p>Include all requirements of a small purchase</p> <p>If working with the AEA purchasing group, you should have a CD on file with the details of the agreement.</p> <p>Everything must be in writing.</p>
800 - Civil Rights	805 How are students with special dietary needs accommodated?	The SFA has three students with completed diet modification form. Each with unique needs; one vegan, one gluten free and one dairy free. SFA is purchasing Pearl soy milk which complies with nutritional standards for a milk substitute. SA shared resources to help planning nutrient dense meals for vegan student, which needs to include a source of protein.
800 - Civil Rights	807 a. How does the SFA collect racial/ethnic data?	ETHNIC/RACIAL FORM: The SFA corrected the Ethnic/Racial form while still on-site. Technical assistance was provided on completing the Ethnic/Racial form. For this form, all students who applied for benefits-free, reduced, and denied--are divided into two identities: Ethnic Identity and Racial Identity. The total in each column for Ethnic Identity must match the total in each column for Racial Identity. Also, each row should equal the total number in column 1. (For example: the total number of Hispanic or Latino applicants must equal the total of numbers

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		awarded free meal status, reduced meal status, and those that did not qualify.)
1000 - Local School Wellness Policy		<p>WELLNESS POLICY: Provided Technical Assistance, the district is required to invite stakeholders to participate in the wellness committee and/or have documentation of the invitation. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p> <p>It is required to review the policy once every three years, the posted policy was last reviewed on March 23, 2016. The policy should be made available to the public.</p> <p>The district is required to complete an assessment of the wellness policy every three years and make the results public.</p>
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	<p>FOOD SAFETY: The SFA is required to have a written HACCP plan in each kitchen. Staff should have a basic knowledge of the plan, and the book should be organized and readily available when it is needed. The HACCP manual should include proper blood born pathogen clean-up.</p> <p>It is recommended that a portion of the required staff training center on HACCP and food safety.</p>
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	<p>Summer Meal Promotion: The SFA should promote Summer Feeding Programs to all students every spring to be sure that families are aware of the availability state-wide. The SFA is required to inform families of this program, even if the SFA does not host a Summer Feeding site.</p>

Site - Level Technical Assistance AHST Elementary School (0409)

Area	Question	Comments
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400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	OFFER VS. SERVE: Technical assistance was provided for SFA to hang signage up that explains what a student must take to complete a reimbursable breakfast. Further clarification was provided on requirements at breakfast and that students must take 1/2 c. fruit 100% fruit juice to be a reimbursable meal.
400 - Meal Components and Quantities - Lunch		FSD must keep CN labels or Product Distribution Statement for all applicable products used. Information on these labels are critical for assessing meal pattern contributions.
400 - Meal Components and Quantities - Lunch	409 Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students? If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.	TA was given to more thoroughly document production as it is happening. Production records should include all items served and any specifications (example: Romaine or Iceberg) Records should be kept for 3 years plus the current year. Standardized recipes should be used for all menu items that combine two or more ingredients to ensure consistency and compliance with guidelines.
800- Civil Rights	800 - What is the non-discrimination statement that is used for appropriate Program materials	NON-DISCRIMINATION STATEMENT: All program material must contain both Federal and Iowa non-discrimination statement OR the shortened statement. Provided Technical Assistance to the SFA where these statements can be located and that they need to be on all program materials.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review? If so, explain.	*Menus, and menu certification worksheets submitted prior to the on-site review indicated a shortage of Dark green vegetables and beans served over the course of the week. Upon investigation beans were served in proper quantities as documented by production records.
1100 - Smart Snacks in School	1105. a. Review 10% of the food and beverages sold during the review month. Do foods and beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods and beverages sold during meal services, meet Smart Snack standards? (Includes food items sold during non-exempt fundraisers) If NO, explain.	<p>SMART SNACKS: Competitive foods and beverages sold to students during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day) must meet Smart Snack guidelines and nutrition standards.</p> <p>These items must be: whole grain-rich; first ingredient must be fruit, vegetable, dairy product or a protein; or be a combination food that contains at least ¼ cup of fruit and/or vegetable. Items must met the calorie, sodium, fat and sugar standards. Items must also adhere to the size restrictions for each age</p>

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		group. Fundraiser activities should be monitored to ensure compliance with these guidelines. A brochure was provided.
1400 - Food Safety	1404 Is the most recent food safety inspection report posted in a publicly visible location? If NO, explain.	FOOD SAFETY: The most recent food safety inspection report should be posted in a publicly visible location. The FSD located the report and posted it during site visit. A food inspection should be conducted by your local agency at minimum once a year, twice is preferred. FSD should contact the local health departments to request an inspection. Keep a copy of this request. FSD had already completed this task prior to on-site visit.
1400 - Food Safety	1405 Was the SFA's written food safety plan implemented? If NO, explain.	TA was given to record leftover quantities and track leftovers. Temperature record templates were located for the SFA to track temperatures of food being cooked as well as proper cooling and re-heating of leftovers.
Dietary Specifications Assessment Tool - Breakfast	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Sodium Levels: The SFA was reminded of the sodium restrictions. Several items in the dry store room were not labeled Low sodium including cream of Chicken soup, baked beans, corn, peas and green beans. SFA should make ordering Low Sodium products a priority. A meal pattern with sodium guidelines was sent to FSD. Whole Grain: SFA had product in storage which did not meet the whole grain requirement. (Saltine Crackers)
Dietary Specifications Assessment Tool - Breakfast	22 Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	PORTION CONTROL: 5-6 students were observed during the review taking an excessive amount of ranch dressing/condiments. While total quantities of the product used for the day averages a reasonable amount with reasonable calorie and sodium, the few students abusing this are consuming an excessive amount of calories and sodium for the day. The SFA is advised to coach the students on what is appropriate quantities of ranch dressing/condiments and explore alternate serving of condiments.

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Description
*MEAL PLANNING AND PRODUCTION: SFA serves menus that are compliant
APPLICATIONS/BENEFIT ISSUANCE (100): The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately transferred in a timely manner to the POS system, and denied applications were correctly determined. The correct and current benefit issuance list was available. Applications were complete with SSN's and case numbers, and all applications were determined within ten days. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Eligibility is kept confidential.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants.
LOCAL SCHOOL WELLNESS POLICY (1000): The wellness policy has been updated within the past three years. The policy has nutrition education, physical activity and other wellness goals included.
MEAL COUNTING & CLAIMING: Meal counts during the on-site review were reasonable when compared to the (December) review month counts. Meal count totals for the month of December appeared accurate and complete. There was a point of service (POS) at the point where meals are served for all students observed at lunch. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. Food Production Records, were on file for all meals claimed for reimbursement for the review period.
On-site Monitoring (900): The on-site monitoring forms were completed for both of the SFA's sites for lunch and breakfast prior to February 1st. Action items were identified with follow-up dates noted.
PROCUREMENT: SFA sent one person to Procurement training in September 2017. SFA has completed a procurement plan, has the code of conduct in place, has completed signature page and has collected most of the debarment statements from vendors. SFA is monitoring contracts and pricing. SFA's Finance Manager has a good understanding of procurement methods and procedures.
REPORTING AND RECORD KEEPING (1500): Reports are filed on time, and all records are maintained for at least three years plus the current year.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification.

Site - Level Commendations AHST Elementary School (0409)

Description
COMPETITIVE FOODS & SMART SNACKS (1100): Students may purchase a second entrée and other a la carte items at the high school. Students at the elementary building may purchase milk a la carte. Students do not have access to vending machines or other opportunities to purchase food outside of the cafeteria. Concession stands open at least 30 minutes after school is out for the day.
FOOD SAFETY (1400): The SFA maintains a clean and well organized kitchen, following safety standards: food handling, recording temperatures, proper labeling and food storage. Staff wore gloves. Food Service Staff took temperatures of food product and recorded the temperatures daily. Cooler, Freezer and dishwasher temperatures were recorded daily.
WATER (1300): Water was available to all students at the water fountain just outside of the dining area during breakfast, lunch and throughout the day.